

REMARKS

Claims 1-49 are pending in the present application. By this response, claims 1-4, 7-10, 13, 14, 18-22, 25-31, 34-37, 40-42 and 45-49 are amended. Claims 1, 30 and 47 are amended to recite subject matter similar to "in response to receiving the request, determining whether a reference bookmark already exists for the document; if the reference bookmark for the document already exists, creating a symbolic link; and linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created." Claims 9, 36 and 48 are amended to recite subject matter similar to "receiving a request to create a symbolic link for a document to an already existing reference bookmark; in response to receiving the request, identifying the already existing reference bookmark; creating the symbolic link to the already existing bookmark; and linking the symbolic link to the already existing reference bookmark." Claims 21, 41 and 49 are amended to recite subject matter similar to "receiving a request to create a symbolic folder link to an already existing reference bookmark folder; in response to receiving the request, identifying the already existing reference bookmark folder; creating the symbolic folder link to the already existing bookmark folder; and linking the symbolic folder link to the already existing reference bookmark folder." Support for these amendments may be found at least on page 13, line 3 to page 14, line 11 and page 1, lines 7-12 of the current specification. Claims 2-4, 7, 8, 10, 13, 14, 18-20, 22, 25-29, 31, 34, 35, 37, 40, 42, 45 and 46 are amended to correct for antecedent basis in view of the amendment to independent claims 1, 9, 21, 30, 36, 41 and 47-49. Claims 8, 19 and 35 are amended to correct minor informalities. Reconsideration of the claims in view of the above amendments and the following remarks is respectfully requested.

I. Examiner Interview

Applicants thank Examiner Schlaifer for the courtesies extended to Applicant's representative during the October 13, 2004 telephone interview. During the interview, the above amendments were discussed in addition to the differences between the prior art and the presently claimed invention were discussed. Examiner Schlaifer stated he would

consider the claim amendments presented by the Applicant. The substance of the interview is summarized in the remarks of sections that follow.

II. Objection to Claims

The Office Action states that claim 8 contains minor informalities. In response, the claims 8, 19 and 35 are rewritten to overcome this objection.

III. 35 U.S.C. § 102, Alleged Anticipation, Claims 1, 9, 10, 30, 36, 37, 47 and 48

The Office Action rejects claims 1, 9, 10, 30, 36, 37, 47 and 48 under 35 U.S.C. § 102(e) as being allegedly anticipated by Khan et al. (U.S. Patent No. 6,460,038 B1). This rejection is respectfully traversed.

As to independent claims 1, 30 and 47, the Office Action states:

Regarding independent claim 1, Khan '038 discloses a method in a data processing system for creating bookmarks (in col. 18, lines 15-65, the invention creates bookmarks), comprising: receiving a request to create a new bookmark for a document (in order to create a bookmark it is inherently necessary that a creation request is received); determining whether a reference bookmark already exists for the document (in step (e) of the claim, a bookmark is accessed remotely); if a the reference bookmark already exists, creating a bookmark link(since the reference bookmark is accessed remotely, it is necessary to create a link to it); and linking the bookmark link to the reference bookmark (linking the bookmark link is a necessary part of creating the bookmark link).

Office Action dated July 29, 2004, pages 2-3.

Claim 1, which is representative of the other rejected independent claims 30 and 47 with respect to similarly recited subject matter, reads as follows:

1. A method in a data processing system for creating symbolic links to bookmarks, comprising:
 - receiving a request to create a new bookmark for a document;
 - in response to receiving the request, determining whether a reference bookmark already exists for the document;
 - if the reference bookmark for the document already exists, creating a symbolic link; and
 - linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches.

Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicant respectfully submits that Khan '038 does not identically show each and every feature of the claims arranged as they are in the claims. Specifically, Khan '038 does not teach in response to receiving the request, determining whether a reference bookmark already exists for the document; if the reference bookmark for the document already exists, creating a symbolic link; and linking the symbolic link to the already existing reference bookmark, wherein a new bookmark is not created.

Khan '038 is directed to a system for programming an Internet browser bookmark for delivering information to a user. In the Khan system a bookmark is created for forming a link to a web site to access the linked web site upon selection of the bookmark. In contradistinction, the presently claimed invention receives a request to create a new bookmark for a document, determines whether a reference bookmark already exists for the document for which the request to create the new bookmark is received and if the reference bookmark for the document already exists, creates a bookmark link which links the bookmark link to the already existing reference bookmark.

Nowhere, in any section, of Khan '038 is it taught to in response to receiving the request, determining whether a reference bookmark already exists for the document. The Office Action alleges that this feature is taught at column 18, lines 15-65, which reads as follows:

21. A method for programming a network browser bookmark for delivering information to a user, comprising:
 - (a) receiving a user command to create a bookmark to a site;
 - (b) creating a bookmark for forming a link to a site to access the linked site upon selection of the bookmark;
 - (c) storing the bookmark on a remote network server;
 - (d) storing a local bookmark on a client computer of a user;

- (e) calling the bookmark stored on the remote network server upon detecting user selection of the local bookmark;
- (f) selecting at least one of a plurality of features for the created bookmark relating to the linked site;
- (g) receiving user input for tailoring the features;
- (h) storing the selected features of the created bookmark;
- (i) initiating the created bookmark;
- (j) executing the selected features of the created bookmark;
- (k) displaying the created bookmark;
- (l) displaying output generated from the execution of the selected features of the created bookmark;
- (m) wherein the features available for selection for the created bookmark include:
 - i. a property storing feature;
 - ii. an event triggering feature;
 - iii. an information communicating feature;
 - iv. an alarm feature, wherein the step of executing the selected features further comprises the steps of setting a date and time; and generating a notification at the set date and time for reminding the user to access the linked site;
 - v. a pushed update feature and wherein the step of executing the selected features further comprises the steps of: selecting a periodic interval for receiving updates; and arranging with the linked site for the transmitting of updates at the periodic interval;
 - vi. a pulled update feature comprising the steps of: selecting at least one keyword, periodically monitoring the linked site for the presence of the selected keyword; and generating a notification upon the detection of the selected keyword in the linked site;
 - vii. a content change detecting feature comprising the steps of: monitoring content of the linked site for changes in the content; and generating a notification upon the detection of a change in the content;
 - viii. a content delivery feature comprising the steps of: extracting content from the linked site, and generating output which includes the extracted content; and
 - ix. a service delivery feature comprising the steps of: extracting sales information from the linked site; and generating output which includes the extracted sales information.

In this section, Khan '038 merely describes the creation of a bookmark where a command is received to create a bookmark to a website, a bookmark is created forming a link to the website which will be accessed upon selection of the bookmark, storing the bookmark on a remote network server, storing a local bookmark on a client computer, and calling the bookmark stored on the remote network server upon detecting user selection of the local

bookmark. The presently claimed invention determines whether a reference bookmark already exists for the document in response to receiving a request to create a new bookmark. Khan '038 does not provide for a determination of whether a bookmark already exists, but, rather, merely creates a new bookmark. Thus, the Khan '038 user may simply have multiple bookmarks referencing the same website.

Additionally, Khan '038 does not teach creating a symbolic link if the reference bookmark for the document already exists and links the symbolic link to the already existing reference bookmark. The Office Action alleges that these features are taught at column 18, lines 15-65, shown above. As discussed above, Khan '038 merely forms a link to the website. Khan '038 does not teach creating a bookmark link which links to an already existing bookmark reference. Thus, Khan '038 fails to teach all of the features of the presently claimed invention.

Independent claims 9, 36 and 48 recite similar features to that of independent claims 1, 30 and 47. That is, independent claim 9, which is representative of the other rejected independent claims 36 and 48 with respect to similarly recited subject matter, recites "receiving a request to create a symbolic link for a document to an already existing reference bookmark, in response to receiving the request, identifying the already existing reference bookmark, creating the symbolic link to the already existing bookmark; and linking the symbolic link to the already existing reference bookmark."

Thus, Khan '038 does not teach each and every feature of independent claims 1, 9, 30, 36, 47 and 48 as is required under 35 U.S.C. § 102. At least by virtue of their dependency on independent claims 9 and 36, the specific features of dependent claims 10 and 37 are not taught by Khan '038. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 1, 9, 10, 30, 36, 37, 47 and 48 under 35 U.S.C. § 102.

Furthermore, Khan '038 does not teach, suggest or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement Khan '038 such that a request is received to create a new bookmark for a document, a determination is made as to whether a reference bookmark already exists for the document in response to receiving the request, a symbolic link is created if the reference bookmark for the document already exists, and

links the symbolic link to the already existing reference bookmark, where a new bookmark is not created, one of ordinary skill in the art would not be led to modify Khan '038 to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion or incentive to modify Khan '038 in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicant's disclosure as a template to make the necessary changes to reach the claimed invention.

IV. 35 U.S.C. § 103, Alleged Obviousness, Claims 2, 3, 5, 15, 16 and 32

The Office Action rejects claims 2, 3, 5, 15, 16 and 32 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 2, 3, 5, 15, 16 and 32 are dependent on independent claims 1, 9 and 30 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 1, 9 and 30. Moreover, Bauersfeld does not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038 and Bauersfeld would not be sufficient to reject independent claims 1, 9 and 30 or claims 2, 3, 5, 15, 16 and 32 by virtue of their dependency.

Additionally, with regard to claim 16, Khan '038 and Bauersfeld, taken alone or in combination, fail to teach or suggest determining whether a bookmark already exists for the document. As discussed above, Khan '038 does not provide for a determination of whether a bookmark already exists, but, rather, would merely create a new bookmark. Thus, the Khan '038 user would have the capability of having multiple bookmarks referencing the same website. Bauersfeld is not relied upon as teaching this feature; however, Bauersfeld provides a page proxy for managing representations of page information and does not determine whether a bookmark already exists for the document.

Moreover, the Office Action may not use the claimed invention as an "instruction manual" or "template" to piece together the teachings of the prior art so that the invention is rendered obvious. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992).

Such reliance is an impermissible use of hindsight with the benefit of Applicants' disclosure. *Id.* Therefore, absent some teaching, suggestion, or incentive in the prior art, Khan '038 and Bauersfeld cannot be properly combined to form the claimed invention. As a result, absent any teaching, suggestion, or incentive from the prior art to make the proposed combination, the presently claimed invention can be reached only through an impermissible use of hindsight with the benefit of Applicant's disclosure as a model for the needed changes.

In view of the above, Khan '038 and Bauersfeld, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1, 9 and 30, from which claims 2, 3, 5, 15, 16 and 32 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2, 3, 5, 15, 16 and 32 under 35 U.S.C. § 103.

V. 35 U.S.C. § 103, Alleged Obviousness, Claims 4, 20 and 31

The Office Action rejects claims 4, 20 and 31 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) and further in view of Reiter (U.S. Patent No. 5,642,503). This rejection is respectfully traversed.

Claims 4, 20 and 31 are dependent on independent claims 1, 9 and 30 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 1, 9 and 30. Moreover, Reiter does not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038 and Reiter would not be sufficient to reject independent claims 1, 9 and 30 or claims 4, 20 and 31 by virtue of their dependency.

Additionally, with regard to claims 4, 20 and 31, Khan '038 and Reiter, taken alone or in combination, fails to teach or suggest wherein the step of linking the symbolic link to the already existing reference bookmark comprises storing a pointer to the already existing reference bookmark in the symbolic link. The Office Action alleges that Reiter teaches this feature at column 3, line 65 to column 4, line 20, which reads as follows:

FIG. 3 is a block diagram of an entry 301 in the version store 105. The entry 301 comprises an address field 302, a user identification field 303, a commit time field 304, a forward link field 305, a backward link

field 306, and a data field 307. The address field 302 contains the location of a corresponding record in the database 106. Preferably, the location of any record is represented by a page identifier and an offset to indicate the location of the record on the page. The user identification field 303 indicates which user caused the version to be created. The commit time field 304 indicates when the entry was committed. A user may undo or roll back an entry at any point in time before commit time. The forward link field 305 and the backward link field 306 contain pointers to other entries (i.e. versions) for the same record. The forward link field 305 contains a pointer to the next older entry (according to commit time) and the backward link field 306 contains a pointer to the next youngest entry (according to commit time). This linked list of entries in the version store 105 is referred to as a version chain. The data field 306 contains a copy of the record before begin time of the modification transaction.

In this section Reiter merely describes an entry in a version store that provides a forward link and a backward link that allows a user to undo or roll back an entry at any point in time before commit time. Thus, the user may go back to previous versions of a document or forward to the next older version until the user commits to a version. While Reiter may provide for the linking of different versions of a document, Reiter does not teach or suggest linking the symbolic link to the already existing reference bookmark which comprises storing a pointer to the already existing reference bookmark in the symbolic link.

In view of the above, Khan '038 and Reiter, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1, 9 and 30, from which claims 4, 20 and 31 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 4, 20 and 31 under 35 U.S.C. § 103.

VI. 35 U.S.C. § 103, Alleged Obviousness, Claims 6, 17 and 33

The Office Action rejects claims 6, 17 and 33 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), further in view of Bauersfeld (U.S. Patent No. 5,917,491) and further in view of Himmel et al. (U.S. Patent No. 6,037,934). This rejection is respectfully traversed.

Claims 6, 17 and 33 are dependent on independent claims 1 and 30 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 1 and 30. Moreover, Bauersfeld and Himmel do not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038, Bauersfeld and Himmel would not be sufficient to reject independent claims 1 and 30 or claims 6, 17 and 33 by virtue of their dependency.

In view of the above, Khan '038, Bauersfeld and Himmel, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 30, from which claims 6, 17 and 33 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 6, 17 and 33 under 35 U.S.C. § 103.

VII. 35 U.S.C. § 103, Alleged Obviousness, Claims 7, 8, 34 and 35

The Office Action rejects claims 7, 8, 34 and 35 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) and further in view of Isreal et al. (U.S. Patent No. 6,330,007 B1). This rejection is respectfully traversed.

Claims 7, 8, 34 and 35 are dependent on independent claims 1 and 30 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 1 and 30. Moreover, Isreal does not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038 and Isreal would not be sufficient to reject independent claims 1 and 30 or claims 7, 8, 34 and 35 by virtue of their dependency.

Additionally, with regard to claims 7, 8, 34 and 35, Khan '038 and Isreal, taken alone or in combination, fail to teach or suggest if the reference bookmark for the document already exists, prompting a user whether to create the symbolic link, wherein the step of creating the symbolic link comprises creating the symbolic link in response to a user's request to create the symbolic link. The Office Action alleges that Isreal teaches this feature at column 12, lines 30-45, which reads as follows:

A Screen List 1050 lists the screens in the database and allows selection. Double-clicking a screen selects it and performs the OK-button function. The resizable-column widths are saved in the initialization file

390. Selecting a Find Button 1040 opens the Find Dialog Box 1100 (FIG. 11), which allows the user to search for a screen by screen ID, screen name, title, prompt or message. If this dialog box was accessed from the user screen 700, selecting the OK button closes this dialog box and displays the selected screen. If this dialog box 1100 was accessed from a Go To button on the Receipt & Status Area, Dynakeys, or Static Keys tabs in the Screen Design Dialog Box 1000, selecting the OK button closes this dialog box and displays the selected screen ID in the Go To field.

If a new screen ID has been entered, selecting the OK button results in a search of the screen list to determine whether the entered screen ID is in fact new. If a match is found (the entered screen ID is not new), a message box opens, explaining that the screen already exists and prompting whether to display it or have the pick-list item, Dynakey, or static key navigate to it. If a match is not found (the entered screen ID is new), opens a prompt box asking whether the user would like to create the screen. If the response is Yes, opens a Create Screen Dialog Box 1200.

Selecting a Cancel Button closes the dialog box without performing any actions. A Find Dialog Box 1100 is depicted in FIG. 11 which allows the user to search the screen list in the Screen Selection Dialog Box 1000 for a screen ID screen name, title, prompt or message. The Find Dialog Box 1100 opens when the Find button is selected in the Screen Selection Dialog Box 1000.

In this section Isreal merely describes that if a user enters a new screen ID, then a search of current screen list is made to determine if the screen ID is in fact new. Nowhere in this section, or any other section of Isreal, is it taught or suggested to determine whether a reference bookmark already exists for the document for which the request to create the new bookmark is received. Neither Khan '038 nor Isreal creates a bookmark link which is linked to an already existing reference bookmark. Thus, neither reference would need to determine whether a reference bookmark already exists for the document for which the request to create the new bookmark is received and if the reference bookmark for the document already exists, prompting a user whether to create the symbolic link, wherein the step of creating the symbolic link comprises creating the symbolic link in response to a user's request to create the symbolic link.

In view of the above, Khan '038 and Isreal, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 1 and 30, from which claims 7, 8, 34 and 35 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 7, 8, 34 and 35 under 35 U.S.C. § 103.

VIII. 35 U.S.C. § 103, Alleged Obviousness, Claims 11-14 and 38-40

The Office Action rejects claims 11-14 and 38-40 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) and further in view of Crandall et al. (U.S. Patent No. 6,321,228 B1). This rejection is respectfully traversed.

Claims 11-14 and 38-40 are dependent on independent claims 9 and 36 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 9 and 36. Moreover, Crandall does not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038 and Crandall would not be sufficient to reject independent claims 9 and 36 or claims 11-14 and 38-40 by virtue of their dependency.

In view of the above, Khan '038 and Crandall, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 9 and 36, from which claims 11-14 and 38-40 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 11-14 and 38-40 under 35 U.S.C. § 103.

IX. 35 U.S.C. § 103, Alleged Obviousness, Claims 18 and 19

The Office Action rejects claims 18 and 19 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), further in view of Isreal et al. (U.S. Patent No. 6,330,007 B1) and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 18 and 19 are dependent on independent claim 9 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claim 9. Moreover, Bauersfeld and Isreal do not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038, Bauersfeld and Isreal would not be sufficient to reject independent claim 9 or claims 18 and 19 by virtue of their dependency. Additionally, the Office Action rejects claims 18 and 19 under similar rationale with respect to claims 7, 8 and 16. Thus, Applicants respectfully submit that these claims are sufficiently addressed with respect to claims 7, 8 and 16 above.

In view of the above, Khan '038, Bauersfeld and Isreal, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claim 9, from which claims 18 and 19 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 18 and 19 under 35 U.S.C. § 103.

X. 35 U.S.C. § 103, Alleged Obviousness, Claims 21, 22, 41, 42 and 49

The Office Action rejects claims 21, 22, 41, 42 and 49 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1) and further in view of Khan et al. (U.S. Patent No. 6,427,175 B1). This rejection is respectfully traversed.

As to independent claims 21, 41 and 49, the Office Action states:

Regarding independent claim 21, the claim is analogous to claim 1 except that instead of bookmarks, bookmark folders are manipulated. However, Khan '175 discloses the use of bookmark folders as organizational tools for bookmarks in lines 1-20 of the Abstract. It would have been obvious to one of ordinary skill in the art at the time of the invention to use bookmark folders in the context of Khan '038 in the manner of Khan '175 in order to take advantage of bookmark folders' applicant as organizational tools for bookmarks.

Office Action dated July 29, 2004, page 10.

Claim 21, which is representative of the other rejected independent claims 41 and 49 with respect to similarly recited subject matter, reads as follows:

21. A method in a data processing system for creating a plurality of symbolic links to bookmark folders from a single reference bookmark folder, comprising:
 - receiving a request to create a symbolic folder link to an already existing reference bookmark folder;
 - in response to receiving the request, identifying the already existing reference bookmark folder;
 - creating the symbolic folder link to the already existing bookmark folder; and
 - linking the symbolic folder link to the already existing reference bookmark folder.

Applicants respectfully submit that Khan '038 and Khan '175, taken alone or in combination, fail to teach or suggest in response to receiving the request, identifying the

already existing reference bookmark folder, creating the symbolic folder link to the already existing bookmark folder, and linking the symbolic folder link to the already existing reference bookmark folder.

The Office Action rejects claims 21, 41 and 49 under similar rationale with respect to claims 1, 30 and 47. Thus, Applicants respectfully submit that these claims are sufficiently addressed with respect to claims 1, 30 and 47 above. That is, Khan '038 is merely describing the creation of a bookmark where a command is received to create a bookmark to a website, a bookmark is created forming a link to the website which will be accessed upon selection of the bookmark, storing the bookmark on a remote network server, storing a local bookmark on a client computer, and calling the bookmark stored on the remote network server upon detecting user selection of the local bookmark. The presently claimed invention identifies the already existing reference bookmark folder in response to receiving the request, creates the symbolic folder link to the already existing reference bookmark folder and links the symbolic folder link to the already existing reference bookmark folder. Khan '038 and Khan '175 do not provide for identifying if a reference bookmark folder already exists, but, rather, would merely create a new bookmark folder. Thus, the Khan '038 and Khan '175 user would have the capability of having multiple bookmarks folders.

Thus, Khan '038 and Khan '175, taken alone or in combination, do not teach or suggest the features of independent claims 21, 41 and 49 as is required under 35 U.S.C. § 103(a). At least by virtue of their dependency on independent claims 21 and 41, the specific features of dependent claims 22 and 42 are not taught by Khan '038 and Khan '175, either alone or in combination. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 21, 22, 41, 42 and 49 under 35 U.S.C. § 103.

XI. 35 U.S.C. § 103, Alleged Obviousness, Claims 23-26 and 43-46

The Office Action rejects claims 23-26 and 43-46 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), further in view of Khan et al. (U.S. Patent No. 6,427,175 B1) and further in view of Crandall et al. (U.S. Patent No. 6,321,228 B1). This rejection is respectfully traversed.

Claims 23-26 and 43-46 are dependent on independent claims 21 and 41 and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claims 21 and 41. Moreover, Khan '175 and Crandall do not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038, Khan '175 and Crandall would not be sufficient to reject independent claims 21 and 41 or claims 23-26 and 43-46 by virtue of their dependency. Additionally, the Office Action rejects claims 18 and 19 under similar rationale with respect to claims 10-14. Thus, Applicants respectfully submit that these claims are sufficiently addressed with respect to claims 10-14 above.

In view of the above, Khan '038, Khan '175 and Crandall, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claims 21 and 41, from which claims 23-26 and 43-46 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 23-26 and 43-46 under 35 U.S.C. § 103.

XII. 35 U.S.C. § 103, Alleged Obviousness, Claims 27 and 28

The Office Action rejects claims 27 and 28 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), further in view of Khan et al. (U.S. Patent No. 6,427,175 B1) and further in view of Bauersfeld (U.S. Patent No. 5,917,491). This rejection is respectfully traversed.

Claims 27 and 28 are dependent on independent claim 21, and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regards to claim 21. Moreover, Khan '175 and Bauersfeld do not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038, Khan '175 and Bauersfeld would not be sufficient to reject independent claim 21 or claims 27 and 28 by virtue of their dependency. Additionally, the Office Action rejects claims 27 and 28 under similar rationale with respect to claims 1-3. Thus, Applicants respectfully submit that these claims are sufficiently addressed with respect to claims 1-3 above.

In view of the above, Khan '038, Khan '175 and Bauersfeld, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claim

21, from which claims 27 and 28 depend. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 27 and 28 under 35 U.S.C. § 103.

XIII. 35 U.S.C. § 103, Alleged Obviousness, Claim 29

The Office Action rejects claim 29 under 35 U.S.C. § 103(a) as being allegedly unpatentable over Khan et al. (U.S. Patent No. 6,460,038 B1), further in view of Khan et al. (U.S. Patent No. 6,427,175 B1) and further in view of Reiter (U.S. Patent No. 5,642,503). This rejection is respectfully traversed.

Claim 29 is dependent on independent claim 21, and, thus, these claims distinguish over Khan '038 for at least the reasons noted above with regard to claim 21. Moreover, Khan '175 and Reiter do not provide for the deficiencies of Khan '038 and, thus, any alleged combination of Khan '038, Khan '175 and Reiter would not be sufficient to reject independent claim 21 or claim 29 by virtue of their dependency. Additionally, the Office Action rejects claim 29 but does not provide a reason for the rejection. Applicant respectfully submits that claim 29 is similar to claim 4 and thus the Examiner would reject claim 29 for a similar rationale with respect to claim 4. Thus, Applicant respectfully submits that this claim is sufficiently addressed with respect to claim 4 above.

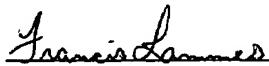
In view of the above, Khan '038, Khan '175 and Reiter, taken either alone or in combination, fail to teach or suggest the specific features recited in independent claim 21, from which claim 29 depends. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 29 under 35 U.S.C. § 103.

XIV. Conclusion

It is respectfully urged that the subject application is patentable over the prior art of record and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

Respectfully submitted,

DATE: October 29, 2004



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